

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JOSEPH L. JUNKOVIC,

Defendant.

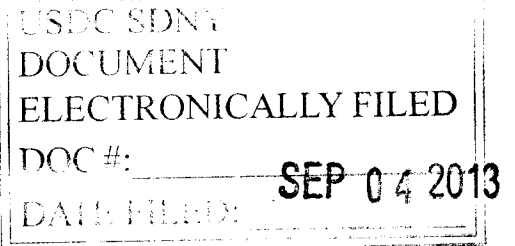
13 CRIM682

INDICTMENT

13 Cr.

COUNT ONE

(Mail Fraud)



The Grand Jury charges:

1. From at least in or about April 2008, up to and including in or about September 2011, in the Southern District of New York and elsewhere, JOSEPH L. JUNKOVIC, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting to do so, placed in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service and deposited and caused to be deposited a matter and thing to be sent and delivered by private and commercial interstate carrier, and took and received therefrom, such matter and thing, and knowingly caused to be delivered by mail and such carrier

JUDGE FORREST

according to the direction thereon, such matter and thing, to wit, JUNKOVIC engaged in a scheme to defraud the New York State Department of Health ("NYSDOH") by obtaining multiple contracts to administer cancer screening services for indigent New Yorkers, and then billing NYSDOH through the use of the mails for thousands of hours of work that he did not in fact perform.

(Title 18, United States Code, Section 1341.)

COUNT TWO

(Theft of Government Property)

The Grand Jury further charges:

2. From at least in or about October 2011, up to and including in or about February 2012, in the Southern District of New York and elsewhere, JOSEPH L. JUNKOVIC, the defendant, willfully and knowingly embezzled, stole, purloined, and converted to his use records, vouchers, money and things of value of the United States and a department and agency thereof, to wit, the United States Department of Health and Human Services ("HHS"), the aggregate value of which exceeded \$1,000, and received, concealed, and retained the same with intent to convert it to his use and gain, knowing it to have been embezzled, stolen, purloined and converted, to wit, JUNKOVIC submitted more than \$400,000 of invoices to a not-for-profit entity funded in significant part by HHS for purportedly performing cancer screening services, when, in truth and in

fact, JUNKOVIC did not perform the work set forth in the invoices and instead used the money he received to pay thousands of dollars in personal expenses.

(Title 18, United States Code, Section 641.)

FORFEITURE ALLEGATION

3. As a result of committing one or more of the offenses alleged in Counts One and Two of this Indictment, JOSEPH L. JUNKOVIC, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the said offenses, including but not limited to the following:

a. At least \$700,000 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offenses alleged in Counts One and Two of this Indictment.

SUBSTITUTE ASSET PROVISION

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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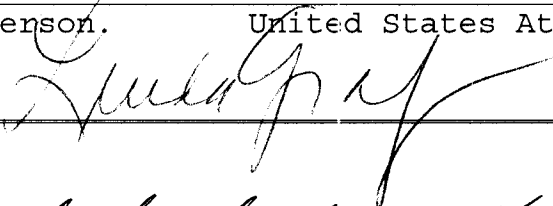
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INDICTMENT

13 Cr.

(18 U.S.C. §§ 641, 1341 )

PREET BHARARA  
Foreperson. United States Attorney.



9/4/13 - Filed Indictment.  
Re Case assigned to Judge Forrest.  
Judge Fox  
USMD